

## **REMARKS/ARGUMENTS**

The Applicant originally submitted Claims 1-20 in the application. No claims have been amended, canceled, or added. Accordingly, Claims 1-20 are currently pending in the application.

### **I. Rejection of Claims 1-20 under 35 U.S.C. §103**

The Examiner has rejected Claims 1-20 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No.5,943,416 to Gisby in view of obviousness. The Applicant respectfully disagrees since Gisby does not teach or suggest signaling call transfer circuitry associated with a central office switch to transfer a telephone call to a subsequent party without requiring equipment associated with a called party to cause the transfer as recited in independent Claims 1, 8 and 15.

Gisby is directed to an automatic survey system for a call center. (*See* column 2, lines 54-55.) Gisby discloses a call center 19 connected to a switching apparatus 17 of a public switched telephone (PSTN) network 13. (*See* column 4, lines 5-18 and Figure 1.) Calls originating from PSTN 13 are routed to telephony switch 21 of the call center 13. (*See* column 4, lines 36-38.) A call center administrator is able to select incoming calls to the call center at the telephony switch 21 for post call surveys. (*See* column 5, lines 18-23, column 4, lines 1-4 and column 4, lines 27-34.) Willing customers are automatically transferred after their session with a target agent to an IVR or a survey agent to participate in the survey. (*See* column 5, lines 53-55.)

Gisby does not teach or suggest, however, signaling call transfer circuitry associated with a central office switch to transfer a telephone call to a subsequent party as recited in independent Claims 1, 8 and 15. Instead, the calls to the call center are transferred after a session with a target agent to an IVR or survey agent by a Computer Telephony Integration (CTI) processor 23 that is

connected to the telephony switch 21. (See column 4, lines 36-41.) Gisby provides no teaching or suggestion of signaling call transfer circuitry associated with the switching apparatus 17 to transfer the call from the target agent. Accordingly, Gisby does not teach or suggest signaling call transfer circuitry associated with a central office switch to transfer a telephone call to a subsequent party.

Additionally, Gisby does not teach or suggest transferring a telephone call to a subsequent party without requiring equipment associated with a called party to cause the transfer as recited in independent Claims 1, 8 and 15. On the contrary, Gisby teaches using equipment associated with a called party to transfer a call to a subsequent party. More specifically, Gisby teaches the CTI processor 23 in association with the telephony switch 21 is used to transfer a call from a target agent to an IVR or a survey agent. (See column 4, lines 36-41.) Both the CTI processor 23 and the telephony switch 21 are in the call center 19 and are associated with the called party. (See column 4, lines 36-44 and Figure 1.) Accordingly, Gisby does not teach or suggest transferring a telephone call to a subsequent party without requiring equipment associated with a called party to cause the transfer.

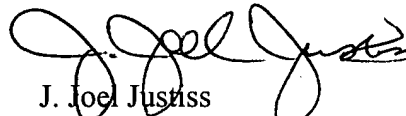
As discussed above, Gisby fails to teach or suggest all of the elements of the inventions recited in independent Claims 1, 8 and 15. The Examiner, therefore, has failed to establish a *prima facie* case of obviousness with respect to Claims 1, 8 and 15 and Claims dependent thereon. Accordingly, the Applicants respectfully request the Examiner withdraw the §103(a) rejection and pass Claims 1-20 to issue.

## II. Conclusion

In view of the foregoing remarks, the Applicants now see all of the claims currently pending in this application to be in condition for allowance and therefore earnestly solicits a Notice of Allowance for Claims 1-20. The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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